

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Case No.: 1:22-cv-1032 (PKC) (JRC)

Plaintiff,

**NOTICE OF MOTION**

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.  
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**PLEASE TAKE NOTICE** that, upon the reading and filing of Plaintiff's and non-party Carlos Roa's Memorandum of Law in Support of their Motion for Entry of Judgment in connection with Defendants' failure to pay attorneys' fees ordered to be paid in the Court's September 25, 2024 Memorandum & Order, Plaintiff, IME Watchdog, Inc. and non-party Carlos Roa, by and through the undersigned counsel, will move this Court before the Honorable Pamela K. Chen, U.S.D.J. as soon as counsel may be heard, for an Order directing the Clerk to enter judgment pursuant to Rule 54(b) and Rule 58 of the Federal Rules of Civil Procedure, 28 U.S.C. § 1927 and Court's inherent power as follows:

(i) In favor of Plaintiff IME Watchdog, Inc. and against Defendants Safa Abdulrahim Gelardi, Vito Gelardi, and IME Companions LLC in the amount of \$58,358.23 in addition to pre-judgment interest and post-judgment interest at the statutory rate computed as provided under 28 U.S.C. § 1961, commencing September 25, 2024, and \$5,000.00 per day as a sanction commencing November 25, 2024 until fully paid; and

(ii) In favor of non-party Carlos Roa and against Defendants Safa Abdulrahim Gelardi, Vito Gelardi, and IME Companions LLC in the amount of \$8,099.11 in addition to pre-judgment interest and post-judgment interest at the statutory rate computed as provided under 28 U.S.C. § 1961, commencing September 25, 2024, and \$5,000.00 per day as a sanction commencing November 25, 2024 until fully paid.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to ¶ III(B) of Judge Chen's Individual Practices and Rules, this motion may be made without a pre-motion conference.

**PLEASE TAKE FURTHER NOTICE**, pursuant to the Court's November 27, 2024 Order, Plaintiff's opposition papers, if any, are due on January 2, 2025, and, pursuant to Rule 6 and Local Civil Rule 6.1, Plaintiff's reply papers in further support are due seven (7) days after Defendants serve their opposition.

Dated: December 2, 2024

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

By: /s/ Jamie S. Felsen  
Attorneys for Plaintiff  
3000 Marcus Ave., Suite 3W8  
Lake Success, NY 11042  
(516) 328-8899

**SAGE LEGAL LLC**

By: /s/ Emanuel Kataev, Esq.  
Attorneys for Plaintiff  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421